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GENERAL ELECTRIC COMPANY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SYLVIA SANTOS,

Plaintiff,

-against-

GENERAL ELECTRIC COMPANY,

Defendant.

10 CV 06948 (JSR) (MHD)

**DECLARATION OF CATHERINE A.
ROGERS, ESQ.**

**(ELECTRONICALLY FILED VIA
ECF)**

I, Catherine A. Rogers, Esq., pursuant to 28 U.S.C. § 1746, hereby declare and state:

1. I am in-house Employment Counsel for Defendant GENERAL ELECTRIC COMPANY in the above-referenced action. I submit this Declaration in support of Defendant's motion to dismiss the Complaint, motion to confirm the arbitration Award dated May 26, 2010, which was issued by American Arbitration Association Arbitrator Jacqueline Drucker, Esq., and GE's motion to enjoin Plaintiff from filing any future actions in federal court regarding GE without permission of this Court. I am fully familiar with the documents set forth below.

2. Attached here as Exhibit A is a copy of the Summons and Complaint filed in this action, along with the U.S. Marshall's Service Statement of Service by Mail dated November 16, 2010.

3. Attached here as Exhibit B is a copy of the United States District Court for the District of Connecticut (Droney, J.) Ruling on Defendant's Motion to Dismiss and to Compel Alternative Dispute Resolution, in the matter *Sylvia Santos v. GE Capital*, 3:04 CV 1472, dated October 11, 2005.

4. Attached hereto as Exhibit C is a copy of the United States Equal Employment Opportunity Commission's ("EEOC"), Notice of Charge of Discrimination in *Santos v. GE Capital*, EEOC Charge No. 161-2004-00121, dated Feb. 6, 2004.

5. Attached hereto as Exhibit D is a copy of the Letter from Paul V. Lalli, Esq., GE Labor Counsel, to Sylvia Santos dated March 15, 2004.

6. Attached hereto as Exhibit E is a copy of the EEOC's Dismissal and Notice of Rights to Sylvia Santos (EEOC Charge No. 161-2004-0012), dated June 15, 2004.

7. Attached hereto as Exhibit F is a copy of the United States Court of Appeals for the Second Circuit's decision in *Sylvia Santos v. GE Capital*, 05-5983-cv, dated May 3, 2006.

8. Attached hereto as Exhibit G is a copy of Sylvia Santos' Claims for Arbitration and Submission to Arbitration before the American Arbitration Association ("AAA"), including amendments, dated June 8, 2007, November 12, 2007 and December 14, 2007.

9. Attached hereto as Exhibit H is a copy of a Letter from AAA to Sylvia Santos and GE dated August 7, 2007.

10. Attached hereto as Exhibit I is a copy of a Letter from AAA to Sylvia Santos and GE dated October 10, 2007.

11. Attached hereto as Exhibit J is a copy of “Plaintiff[‘s] Motion to Reopen Case; Vacate Order and Judgment of Oct. 11, 2005; Order Staying or Denying Arbitration and defendant’s internal dispute program” filed by Sylvia Santos in the United States District Court for the District of Connecticut, in the matter *Sylvia Santos v. GE Capital*, 3:04 Civ. 1472, dated Nov. 16, 2007 (without attachments).

12. Attached hereto as Exhibit K is a copy of a letter from AAA to Sylvia Santos and GE dated December 21, 2007 (enclosing Disclosures of Arbitrator Jacqueline F. Drucker dated Dec. 20, 2007); Letter from AAA to Sylvia Santos and GE dated December 28, 2007; and Letter from AAA to Sylvia Santos and GE dated February 14, 2008 (enclosing the Arbitrator’s Pre-Hearing Order and Record of First Arbitration Management Conference held on Jan. 23, 2008).

13. Attached hereto as Exhibit L is a copy of a Letter from AAA to Sylvia Santos and GE dated February 22, 2008 (enclosing Arbitrator’s Pre-Hearing Order Regarding Claimant’s Request for Suspension dated Feb. 22, 2008).

14. Attached hereto as Exhibit M is a copy of the “Motion to Recuse Judge and Order a New Trial and Change of Venue” filed by Sylvia Santos in the United States District Court for the District of Connecticut, in the matter *Sylvia Santos v. GE Capital*, 3:04 Civ. 1472, dated Feb. 28, 2008 (with attachments).

15. Attached hereto as Exhibit N is a copy of a Letter from the AAA to Sylvia

Santos and GE dated Mar. 21, 2008.

16. Attached hereto as Exhibit O is the “Summary of ECF Activity” in the United States District Court for the District of Connecticut, in the matter *Sylvia Santos v. GE Capital*, 3:04 Civ. 1472, dated June 4, 2008 (enclosing Order denying Santos’ Motion to Vacate, Motion for a New Trial, Motion to Transfer/Disqualify/Recuse Judge, and Motion to Reopen Case (Droney, J.)).

17. Attached hereto as Exhibit P is a copy of a Letter from the AAA to Sylvia Santos and GE dated May 26, 2009 (enclosing Supplemental Disclosures of Arbitrator and Notice of Appearance by Lisa Brauner, Esq., of Littler Mendelson); and a copy of an Email from AAA to Sylvia Santos dated July 10, 2009 containing additional Disclosures of Arbitrator Drucker.

18. Attached hereto as Exhibit Q is a copy of the Arbitrator’s Pre-Hearing Order and Record of April 18, 2009 Arbitration Management Conference dated May 5, 2009, and the Arbitrator’s Pre Hearing Order and Record of August 31, 2009 Arbitration Management Conference dated Sept. 1, 2009.

19. Attached hereto as Exhibit R is a copy of a Letter from the AAA to Sylvia Santos and GE dated July 29, 2010.

20. Attached hereto as Exhibit S is a copy of the Arbitrator’s Pre-Hearing Order and Record of September 4, 2009 Arbitration Management Conference.

21. Attached hereto as Exhibit T is an excerpt from the Transcript of Proceedings on November 23, 2009 before Arbitrator Drucker, pp. 1-2, 126-136.

22. Attached hereto as Exhibit U is a copy of the Arbitrator's Pre-Hearing Order dated Feb. 23, 2010; the Arbitrator's Pre-Hearing Order dated Mar. 30, 2010; and the Arbitrator's Pre-Hearing Order dated Apr. 9, 2010.

23. Attached hereto as Exhibit V is a copy of a Letter from AAA to Sylvia Santos and GE dated May 26, 2010 and the Arbitrator's Award dated May 26, 2010.

Executed this 30th day of December 2010 in Fairfield, Connecticut.

/s/
Catherine A. Rogers, Esq.

TO: Sylvia Santos, Plaintiff *Pro Se*
4415 Furman Avenue
Bronx, NY 10466

CERTIFICATE OF SERVICE

I, Gregory Reilly, hereby certify that I caused a true and correct copy of the foregoing Declaration of Catherine A. Rogers to be filed via the Electronic Case Filing System (“ECF”) and served the document by FEDERAL EXPRESS and regular, first-class mail by causing it to be deposited in a U.S. postal mailbox and addressed to Plaintiff *Pro Se* Sylvia Santos on December 30, 2010 as follows:

Sylvia Santos
4415 Furman Avenue
Bronx, NY 10466

/s/ Gregory Reilly
Gregory Reilly

Date: December 30, 2010